

FILED
RICHARD W. RAGEL
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
CIVIL DIVISION

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
1ST. DIV. COLUMBUS

Marsha M. White, Pro Se

(Enter Above the Name of the Plaintiff in this Action)

2 18 CV 1309

vs.

Public Safety (BMV)

(Enter above the name of the Defendant in this Action)

Jury

If there are additional Defendants, please list them:

Judge Smith

MAGISTRATE JUDGE DEAVERS

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Marsha M. White, Pro Se

Name - Full Name Please - PRINT

2957 Quinby Drive

Street Address

Columbus, Ohio 43232

City, State and Zip Code

614-674-7781

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. **Public Safety (BMV)**

Name - Full Name Please

1970 West Broad Street Columbus, Ohio 43216

Address: Street, City, State and Zip Code

2.

3.

4.

5.

6.

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- Title VII United States Code, Section 42 USC
[Other federal status giving the court subject matter jurisdiction.]

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

1. This court has jurisdiction over the subject matter of the civil action pursuant to Title

VII of the Civil Rights Act of 1964 , as amended, 42 U.S.C. Right to sue letters from
EEOC.

2. Plaintiff, Marsha M. White, Pro Se, brings this action pursuant to Title VII of the Civil Rights Act
of 1964, as amended 42 U.S.C. citing Harassment , Workplace Violence and Retaliation,
all covered under Title VII of Civil Rights Act of 1964, as amended, 42 U.S.C.

3. This cause of action arises from Defendant Public Safety (BMV) deliberately allowed
Nancy Blair, Supervisor to ignore Plaintiff response to harassment and workplace violence from
co-worker Athena Fister (white) since October 11, 2017. Public Safety (BMV) has a
history of subjecting Ms. White to Workplace Violence and Supervisor Intimidation.
Defendant's failure to promptly and appropriately investigate and respond to the harassment
to Plaintiff, subjected Plaintiff to further harassment and hostile environment. see Ex. 1

4. Plaintiff, Marsha M. White, African-American female, age 55 years old, has been employed
with Public Safety for 29 years, as a CSA2. Ms. White is in a certified position. Plaintiff is a
member of OCSEA, Collective Bargaining Civil Service Association.

5. Ms. White has been an employee of Title Support since September 19, 2016. When
Ms. White started complaining about the training she was receiving from Nancy
Blair, Supervisor (white) and addressed feeling she was not being treated equally
as two white employees hired after Ms. White. Lily Langley was hired in January 2017
Athen Fister was hired May 2017 both received complete training and was allowed
See Attached Continued Sheet Statement of Claims.

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

<u>Case Number</u>	<u>Caption</u>
<u>2:15-cv-2091</u>	<u>Marsha M. White, Pro Se</u> vs. <u>Public Safety, BMV</u>
_____	_____
_____	_____
_____	_____
_____	_____

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

WHEREFORE, Plaintiff respectfully request Judgement in her favor and against

Public Safety, (BMV) as follows:

A. Move the employees who were dishonest and caused a hostile environment
to another department away from Ms. White.

B. Compensatory damages for Plaintiff's Intentional Infliction of emotional stress,
due to the harassment, retaliation, and discrimination. \$250,000.00

C. Punitive Damages:

D. Reimbursement for all court and filing fees incurred with this lawsuit.

E. Defamation of Character.

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 25 day of October, 2018.

Marsha M. White, Pro Se
Signature of Plaintiff

Continued Sheet Statement of Claims:

to sit with CSA2 lead Kenya Martin for personal training. Ms. White had to file EEOC complaint to receive some training. This when Nancy Blair, Supervisor started harassing and retaliating on Ms. White, allowing Ms. White to be harassed by co-worker Athena Fister repeatedly. See Ex. 2

6. On October 11, 2017, Ms. White went to her Supervisor Nancy Blair, upset by the comments that were made by co-worker Athena Fister, stating the way Ms White process her work is stupid, and being discourteous to Ms White in the workplace. Mrs Blair, Supervisor stated she would take care of it, Ms. Blair informed Lolitha Jordan, CSA 3 of the incident. Ms. Blair allowed Athena Fister to later retaliate on Ms. White stating Ms. White and Cherelle Bates were laughing at her. Both were addressed in the aisleway instead of being taken into a conference room to discuss, while Athena Fister watched to make sure both were talked too.

7. On October 31, 2017, Ms White scheduled meeting with Kathy Corrigan, Administrator (white), to discuss still needing training and the comments Athena Fister continue to comment on, which Nancy Blair, Supervisor stated she took care of. Mrs. Kathy Corrigan sent Ms White an e-mail referring to their meeting, stating Ms White would be allotted time for one on one training with the CSA3 (lead) Lolitha Jordan, which never happened by November 2017. Also all comments would be addressed. See Ex 3.

8. On January 2, 2018, Nancy Blair, Supervisor moved a Coffee and Water machine in pod across from Ms White, which was an distraction to Ms. White trying to get trained with employee traffic getting water and coffee through out the day, and the two machines making distracting noises. Ms White complained. On January 5, 2018 Ms. White e-mailed Kathy Corrigan, Administrator in reference to the two machines distracting her while working. Ex. 4

9. On January 10, 2018, another meeting was held with Ms. White, in attendance was Molly Dejorias, Labor Relation from Human Resource, Kathy Corrigan, Adminstrator, and Teresa Johnson, Chief. Mrs Kathy Corrigan, Administrator stated she decided to do a group training now, without informing Ms. White she was not going to honor her e-mail to Ms White back in October 31, 2017. Leaving Ms. White waiting. Mrs Corrigan had no dates when these group training would even start in the meeting. Ms. White informed Molly Dejorias, she held off on signing the charges with the EEOC from the complaint filed August, 26, 2017, due to Mrs Corrigan stating Ms White would receive training by November 2017, which Ms White never did. Mrs. Kathy Corrigan stated in an e-mail to Ms White, it would be less noise to have machines sitting across from Ms. White then a co-worker. Ms White was in a protected class since August 26, 2017 to present. See Exhibits 2,5.

10. On April 24, 2018 Ms. White e-mailed Molly DeRojas, Labor Relations Officer, about her concerns that Nancy Blair, Supervisor was not taking care of the hostile situation with co-worker Athena Fister. See Ex. 6.

11. On April 27, 2018, Athena Fister, (white) approached Ms. White in her aisleway where Ms. White sits, yelling she had the right to defend herself. Ms. Fister has been retrieving Ms. White's

and Patti Wright's work, which was already completed by them, for their production. Ms. Fister was reprocessing and counting the work for her own production. When Ms. Fister approached Ms. White yelling, Nancy Blair, Supervisor was present along with Lolitha Jordan, Lead, and Patti Wright. Mrs. Jordan, and Ms. White addressed Nancy Blair, Supervisor, how uncomfortable and hostile Ms. Fister's actions were. Mrs. Blair stated she will take care of it. Mrs. Blair, Supervisor did not take care of the problem per DPS. Policy 501.29, 501.05 and 505.05. No action was taken, Ms. Fister continued being discourteous and creating a hostile environment. See Exhibit

12. On May 23, 2018, Ms. Fister continued to make derogatory remarks trying to provoke Ms. White while standing at a co-worker desk. Ms. Fister walked past and looked at Ms. White started laughing, stating she can roll her eyes and laugh if she wanted to, this comment came out of nowhere. Ms. White was very uncomfortable and informed Nancy Blair, Supervisor again of Ms. Fister's actions. Mrs. Blair again ignored Ms. White's concerns, stating she will take care of it. These are not isolated incidents. Ms. Fister has been hostile to several other co-workers in the department such as, Cherelle Bates, Arlisha Reynolds, Patti Wright, Lolitha Jordan. All Afro Americans employees. All these employees informed Nancy Blair, Supervisor and nothing was done, Mrs. Blair stated she will take care of it, but never handled the situation. See Ex.7.

13. On June 27, 2018, Ms. White went to Nancy Blair, Supervisor again with concerns with Ms. Fister giving Ms. White unwelcoming looks and blocking the aisleway trying to provoke Ms. White. Ms. White expressed her concerns to Nancy Blair, Supervisor, again. Ms. White stated to Mrs. Blair she had the right to defend herself if something happened. Mrs. Blair stated ok.

On the same day June 27, 2018, Ms. White, Lolitha Jordan, (black) and Cherelle Bates, (black) were called into conference room questioned about accusations, that Ms. White blocked Ms. Fister from coming down aisleway at Ms. Bates desk. Present in Meeting were, Tyrone Reynolds, Labor relations, and Krysten McElfresh, Labor Relations, both questioned Mrs. Jordan, and Ms. Bates to confirm what happened in aisleway. Mrs. Jordan witnessed for Ms. White, along with informing them of her encounter she had with Ms. Fister, and informing Nancy Blair, Supervisor of her concerns. Cherelle Bates also witness for Ms. White that Ms. Fister's accusations were false. Ms. Bates, explained she encountered some incidents with Ms. Fister and informed Nancy Blair, Supervisor, Ms. Blair ignored Ms. Bates as well.

14. On June 29, 2018, Ms. White was brought into conference room Mrs. Blair did not tell Ms. White what the meeting was about. Nancy Blair, Supervisor threaten Ms. White with Discipline, without a Union Steward. Mrs. Blair informed Ms. White she inappropriately documented the portal, and discourteous to Ms. Fister. Ms. White must attend mandatory one on one meetings with Mrs. Blair, Supervisor, along with different Supervisor's from other departments to sit in as witnesses. Ms. White was told if she takes off using vacation or personal she must bring in documentation to why she was off. Molly Dejorias, Labor Relations Officer, knew of Ms. White's concerns about harassment and the hostile behavior from Ms. Fister. instead handling the situation per DPS Policy 501.05, 501.29 and 505.05, which applies to everyone. not certain employees. she initiated the mandatory one on one meetings. Molly Dejorias, Labor Relations Officer has been instrumental, and have condoned the harassment against Ms. White since

August 29, 2017. Ms. Dejorias already knew Ms. White's concerns, Ms. White e-mailed her back on April 24, 2018 as stated above. See Exhibits 8

15. On July 3, 2018 and July 9, 2018, Ms. White received phone calls from a state phone that belongs to Quan Boyd, Manager. Ms. White returned call, no answer. See EX. 9

16. On July 5, 2018, Ms. White was call back into conference room for a one on one meeting. Mrs. Blair, Supervisor threaten Ms. White again, stating Ms. White was not to sent anymore e-mails to Management or Human Resources, stating they were not necessary. Ms. White was reporting a Hostile Environment and her concerns. Ms. White informed she received a call from Quan Boyd, Assistant Chief telephone number. Quan Boyd stated she did not call Ms. White, Ms. White told her it is on her cell phone, then she stated she didn't know why she would call Ms. White, then she stated someone must have used her phone. Nancy Blair, Supervisor altered a document she had Ms. White sign, reference to the meeting requirements after Ms. White left the meeting without Ms. White's knowledge. Ms. White did not make the statement Nancy Blair wrote in her handwriting. Ms. White would have written the statement herself or put her initials acknowledging the statement. Ms. White has not filed a grievance to arbitrate yet. Nancy Blair stated Kathy Corrigan, Administrator told her to add the verbiage to the document See Exhibit 10 and 18.

17. On July 13, 2018, the entire department had a mandatory cultural training class initiated by management in need of help to improve the department and how to deal with the employees.

Trainer, David Sapper and his assistant Kolleen Scott, became short and cut Ms. White off this when Ms. White and other employees tried to express their concerns, both trainers refuse to hear what the employees had to say about the treatment received by management and their Supervisors. Mr. Sapper apologized to Ms. White.

Kolleen Scott, Trainer missed taking notes in the training class, she gave Ms. White a call needing information about the training class, when Ms. White was unable to assist, Kolleen Scott came down to the department, approached Ms. White again at the Copier machine, asking Ms. White what was her responds to the question she called Ms. White about. Ms. White stated she did not remember, but she would choose another answer. See Exhibit 11

18. On July 25, 2018, Ms. White filed a grievance for lack of training on ETA Title work, harassment, and intimidation, for making Ms. White attend mandatory one on one meetings. See Exhibit 12.

19. On August 8, 2018, Step 1 meeting concluded with Ms. White no longer having to attend weekly meetings, effective August 8, 2018, and training on ETA Title work on August 16. 2018. Krysten McElfresh, wanted The Union President, Tracey Charles to withdraw the grievance immediately. The Union refuse to withdraw the grievance at the time, due to the other issue of harassing Ms. White in the building and calling her on Ms. White's cell phone, along with only having training for couple of hours. Krysten McElfresh, Labor Relations Officer was dishonest. stated there was no progress in the one on one meetings and there was no violation of the contract, also Ms. White showed no proof of Management calling her on her cell phone. so Mc

White's grievance was denied. Management complied with part of Ms. White's request in the grievance, refuse to comply with the rest of the grievance pertaining to harassment. Exhibits 12

20. On August 21, 2018, Ms. White was called into a meeting, stating she was being investigated for being discourteous and mistreating fellow employees. Present were Jeff Barker, Investigator, Toby Ferguson, EEO Officer, and Traci Charles, President of the OCSEA Union. Exhibit 13

Mr. Barker (White), proceeded to state he was going to let Ms. White drive the interview and he was going to ask general questions that Ms. White must answer. Ms. Charles intercepted, stating to Mr. Barker you can't just ask general questions, Mr. Barker stated that he can.

Mr. Barker started off asking Ms. White was she growling at her desk, Ms. White stated no, she was not an animal.

Mr. Barker proceeded to ask Ms. White did she occupy space from Athena Fister. Ms. White asked him what does that mean? Mr. Barker stated you know like a bear. Ms. White was in shock and told Mr. Barker she was offended, he asked did he offend her. Her answer was no to the question.

Mr. Barker asked Ms. White did she do stand offs. Ms. White asked what does that mean. Mr. Barker stated like playing chicken, Ms. White stated what is chicken, he looked at Ms. White as though she should know what playing chicken is. Mr. Barker stated when two cars drive head on until one veers off. Ms. White stated no. Ms. White was very humiliated and offended that Mr. Barker continued to violate her in such manner.

Ms. Ferguson took her part joining in describing Ms. White as some type of animal. Ms. Ferguson stated you know when a Pee-cock is angry they spread their wings. Then Ms. Ferguson proceeded to ask Ms. White why do she document the way she do. Ms. White again very offended being described as an animal.

Mr. Barker proceeded to ask Ms. White questions like was she staring at co-worker, Athena Fister, was she bulling co-workers, was she making faces at co-workers. did Ms. White do road rage last September 2017, did she live by a Tyra Bryant near Kimball. Did Ms. White sabotage a water machine, did Ms. White not hold a door open for a co-worker Athena Fister. Did Ms. White follow Athena Fister down a hallway. When Ms. White asked for dates and times all these incidents happen, and witnesses, Mr. Barker gave range dates and told Ms. White he is asking the questions, and she would get all of that in the report.

When Mr. Barker, gave Ms. White some names he stated if he gave Ms. White the names he did not want her to retaliate on the co-workers. Mr. Barker was very bias throughout the entire interview. Mr. Barker acted as Athena Fister's attorney rather than an investigator, he rebutted Ms. White's answers throughout the entire interview. Mr. Barker refer to Ms. White's witnesses as her group and was her group rivals of Athena Fister's witnesses.

21. August 23, 2018, Ms. White was called by upstairs for another interview where Mr. Barker continued to harass Ms. White. Mr. Barker continued to ask Ms. White did she make a remark

about OG's in the neighborhood. Ms. White asked him what is OG'S, Mr. Barker stated gangsters. Mr. Barker making references that Ms. White associates with gangsters.

Ms. White was upset by all the name calling and having to come back to a meeting, so Mr. Barker can continue to degrade Ms. White. Ms. White told them she did not appreciate being referenced to animals. Mr. Barker and Ms. Ferguson quickly stated they were not them ones who described her having animal behavior. Both felt as long, as it was not them referencing it, it is ok to repeat and accept their behavior for referencing MS. White in that manner to get their point across.

Continued Statement of Claims:

22. On October 23, 2018, Ms. White received a Pre-D discipline packet, pending discipline up to removal, stemming from an investigation initiated on August 21, 2018 by Jeff Barker, Investigator.

Mr. Barker added a violation to 1.10 Act of Discrimination to the investigation after the investigation was closed on September 27, 2018, without Ms. White and Union President Tracie Blount knowledge. Ms. White was only informed of one alleged violation which was 1.2 (B) in the meeting. See Exhibit 13, and 14.

Mr. Barker was dishonest stating the investigation was initiated on June 29, 2018, when in fact the date was August 21, 2018. Mr. Barker tried to back date the document to justify being in a protected class, when in fact Ms. White has been in a protected class since she filed discrimination back in August 26, 2017, July 13 and 25, 2018, August 15 the right to sue letters from EEOC, long before Nancy Blair, Supervisor and Jeff Barker, Investigator started the harassment to Ms. White. See Exhibits 2, 15 and 16.

Mr. Barker added Ms. White's Federal Court Case she filed in May of 2015 as part of his evidence to discipline Ms. White in the Pre-D. Ms. White's court case has no relevancy to the allegations presented to Ms. White on August 21, 2018. Ms. White was in a protected class due to filing discrimination against DPS in 2015, and this should not have been added to the current allegations. See Exhibit 15, 16, 17.

The statements provided by Athena Fister, Angela Johnson, Demitria Crumiell-Hagen, and Tiara Bryant shows they have been collaborating together to get their stories to match each other. The statements show they have been telling each other what happened with Ms. White. The verbiage in all their statements are exactly the same. The statements do not give exact dates, times and other witnessed other them themselves to these incidents. There camera's in and out of the DPS building, and plenty of employees and Highway Patrol walking the hallways, but no one seen any of these incidents but the four employees, which are friends to each other. See Exhibits 18. All statements.

Mr. Barker, Investigator added Discrimination to the Investigation, there is no mention from any of the four co-workers stating Ms. White discriminated against them in anyway. There was no mention of in Nancy Blair's statement that Ms. White discriminated against her or anyone in the department. See Exhibit 18 page 6.

Mr. Barker, Investigator could not provide exact dates and times these incidents happened, he could not provide any other witnesses to collaborate Athena Fister claim nor could he provide any witnessed for the other three co-workers.

Athena Fister, states Ms. White saw her leave her desk and followed her down the hallway, and things on her desk was disturbed. Ms. White could not have disturbed any items on her desk, due to Athena Fister stated Ms. White followed her. Athena Fister has proven to be dishonest throughout this entire investigation. Athena Fister admitted she takes other employees work, it is her focus. See exhibit 18 page 13.

Ms. Fister stated Ms. White did not hold the door open for her after a training class on July 13, 2018. See Exhibit 18 page 30 Tami Reichman's statement.

Ms. White was told she could not discuss anything about the investigation or incidents to other employees in department, but allowed Athena Fister, Angela Johnson, Tiara Bryant, and Demitria Crumiell-Hagen to discuss the case and incidents. See Exhibit 18 page 7. And Exhibits 19, there is no mention in policy or contract that states you can't talk about investigation.

Mr. Barker and Toby Chambliss allowed Athena Fister and the other employees to describe Ms. White to different animals and their behavior, which is a violation of DPS policy 501.29. These names were put in writing and was a defamation of Ms. White's character for no reason. See Exhibit 18 page 12.

In Tiara Bryant, Andrea Gary, and Demitria Crumiell-Hagen statement it was stated that Ms. White was very angry and was slamming cabinets because she was not invited to Tiara Bryant birthday luncheon. These co-workers were very dishonest due to Ms. White is a Jehovah Witness and they do not celebrate holidays. See Exhibit 18. Page 16,17,19 paragraph 5.

Mr. Barker, Investigator added the incident on June 26, 2018 alleged by Athena Fister in his investigation to discipline Ms. White, when the incident was unfounded on June 27, 2018 through Human Resources. See Exhibit 20.

Continued Statement of Claim:

23. Mrs. Blair, Supervisor has given her opinion of Ms. White throughout this entire investigation, Mrs. Blair is very bias and refused to address Ms. White's concerns due to her dislike for MS. White. Mrs. Blair stated in her statement that Ms. White has turned other employees against Athena Fister with no facts, the employees she stated is unaware of Mrs. Blair's accusation of them. Mrs. Blair stated Ms. White is an instigator this the way she sees it. Ms. Blair was dishonest stating Ms. White stated if Athena touches me I will defend myself, Ms. Blair immediately contacted Teresa Johnson which has been aware of Ms. White's concerns due to Ms. White cc everyone in charge, immediately contacted the Registrar's Office to discipline Ms. White without any proof Ms. White said this to Nancy Blair. Human Resources can down department immediately to address the issue. No harm was found, and Ms. White had witnesses to support that Athena Fister was dishonest and Nancy Blair, Supervisor. See Exhibits 20

Mrs. Blair, has only given her opinion of Ms. White degrading her character with her opinions. Mrs. Blair shows no facts in her comments about Ms. White. There were mention of other employees Athena Fister states caused a hostile environment, Mrs. Blair only focused on Ms. White to harass and discipline. Mrs. Blair stated 95% she is not at work to witness incidents, Mrs. Blair rarely comes to work leaving the department unattended. Mrs. Blair was not at work on June 26, 2018.

Mrs. Blair has never contacted Human Resources to help Ms. White only to get her disciplined, she never addressed Ms. White's concerns, Mrs. Blair only contacted them for Athena Fister. Mrs. Blair contacted Labor Relations to offer Athena Fister help through the EAP program, which Athena Fister rejected. Ms. White is participant of the EAP program, she contacted them herself no one would help her. The contact person is Brooklyn. Ms. White is seeing a counselor about the stress she is under dealing with the hostile environment and Nancy Blair, Supervisor allowing Ms. White to be harassed by Athena Fister and harassing Ms. White herself. See Exhibits 18 page 5 para. 5, and 7

Mrs. Blair, would address Ms. White's concerns in staff meetings stating don't let people rent space in your head, then talks about perception. See Exhibit 21

Mrs. Blair, Supervisor stated Ms. White inappropriately documented the portal. Ms. White followed DPS title support procedures, it states to give brief description for log off time. On October 24, 2018 a meeting was held stating there will be changes on how to document the portal starting Monday 28, 2018 and no later than November 2, 2018. See Exhibits 22.

24. Ms. White was accused of being rude in training class on July 13 and 24. Ms. White was cut off talking in the training class, so Ms. White remained quiet throughout the training class. Trainer David Sapper apologized and shook Ms. White's hand in front of the entire class. See Exhibit 23

On July 24, 2018 Kolleen Scott, Trainer stated Ms. White was rude because she did not like Ms. White's answer, she felt it made her feel incompetent. Ms. Scott was dishonest stating Ms. White

wrote something derogatory about her in the handbook on page 17. Ms. White showed page 17 and it was blank. Ms. White did show what she did write, and it was not negative, See Exhibits 24.

25. Mr. Barker, also stated he Ms. White would be allowed to write a statement. Mr. Barker never allowed Ms. White to do so. Mr. Barker stated this is his interview. The written information in packet is not detailed as on the recording. See Exhibits 25 and a CD on interview.